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*Counsel for Paul Crouch, Individually and as  
Executor and as Executor Ad Prosequendum of  
the Estate of Cynthia Lorraine Crouch*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	)	Chapter 11
	)	
LTL MANAGEMENT LLC,	)	Case No.: 23-12825-MBK
	)	
Debtor.	)	Judge: Michael B. Kaplan

**APPLICATION FOR ORDER SHORTENING TIME**

Paul Crouch, Individually and as Executor and as Executor Ad Prosequendum of the Estate of Cynthia Lorraine Crouch, requests that the time period to notice a hearing on the **Paul Crouch's Motion to Preclude Debtor's Proffered Expert Testimony of Charles H. Mullin and Gregory K. Bell** as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1) and the *Order Establishing Case Management and Administrative Procedures* [Dkt. 554], for the reasons set forth below:

1. A shortened hearing time is requested because: The Debtor has proffered expert reports and testimony for the hearing on the numerous Motions to Dismiss pending before the Court and set to be heard beginning on Tuesday, June 27, 2023. As recently as this week, the Debtor has provided an additional report from one of its proffered experts.

2. Mr. Crouch's Motion seeks to preclude the Debtor's proffered testimony from Charles H. Mullin, Ph.D and Gregory K. Bell, Ph.D. Mr. Bell was deposed yesterday. Mr. Mullin will be deposed tomorrow. Obviously, the Motion needs to be ruled upon prior to the

commencement of the hearing.

3. State the hearing dates requested: Mr. Crouch respectfully requests that this matter be scheduled for a hearing on Tuesday, June 27, 2023, at 9:00 a.m.

4. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

Respectfully submitted:

Dated: June 22, 2023

*/s/ Moshe Maimon*

Moshe Maimon (I.D. 042691986)

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